

# RESCINDED

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## Pandemic Planning: Interagency Guidance

**The guidance attached to this bulletin continues to apply to federal savings associations.**

The Federal Financial Institutions Examination Council (FFIEC) has issued the attached [Interagency Statement on Pandemic Planning](#) for use in identifying the continuity planning that should be in place to minimize the potential adverse effects of a pandemic. This guidance expands upon the contents of the Interagency Advisory on Influenza Pandemic Preparedness issued in March 2006.

Pandemic planning presents unique challenges to national banks. Unlike most natural or technical disasters and malicious acts, the impact of a pandemic is much more difficult to determine because of the anticipated difference in scale and duration. As a result of these differences, no individual or organization is safe from the potential adverse effects of a pandemic event. Experts believe that the most significant challenge may be the severe staffing shortages that will likely result from a pandemic outbreak.

The FFIEC agencies believe the potentially significant effects a pandemic could have on an institution justify establishing plans to address how each institution will manage a pandemic event.

Accordingly, an institution's business continuity plan should include:

- A preventive program to reduce the likelihood an institution's operation will be significantly affected by a pandemic event;
- A documented strategy that provides for scaling pandemic efforts commensurate with the particular stages of a pandemic outbreak;

To

Chief Executive Officers of  
All National Banks,  
Federal Branches and  
Agencies, Technology  
Service Providers and  
Software Vendors,  
Department and Division  
Heads, and All Examining  
Personnel

- A comprehensive framework of facilities, systems, or procedures to continue critical operations if large numbers of staff members are unavailable for prolonged periods;
- A testing program to ensure the institution's pandemic planning practices and capabilities are effective and will allow critical operations to continue; and
- An oversight program to ensure ongoing review and updates to the pandemic plan.

The traditional BCP methodologies detailed in the FFIEC Business Continuity Planning Booklet provide national banks an excellent framework for developing and/or updating their pandemic plan, as well as a means to integrate these five key activities into the final pandemic plan. In addition, the booklet references comprehensive U.S. Government agencies and industry association guidance that can further assist national banks in developing their pandemic plans.

For questions concerning the guidance, please contact Jim Devlin, Special Advisor for Operational Risk at (202) 649-6550.

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## Related Links

- [Interagency Statement on Pandemic Planning](#)
- [FFIEC Press Release](#)